

**AUTHORITY FOR ADVANCE RULING, TAMIL NADU  
No.207, 2<sup>nd</sup> FLOOR, PAPJM BUILDING, No.1, GREAMS ROAD,  
CHENNAI 600 006.**

**ORDER UNDER SECTION 98(4) OF THE CGST ACT, 2017 AND  
UNDER SECTION 98(4) OF THE TNGST ACT, 2017**

**Members present:**

<b>Shri C. Thiyagarajan, I.R.S., Commissioner/Member (CGST), Office of the Commissioner of GST and Central Excise, Audit I Commissionerate, Chennai - 600 101.</b>	<b>Shri B. Suseel Kumar, B.E., MBA., Joint Commissioner/Member (SGST), Authority for Advance Ruling, Tamil Nadu, Chennai - 600 006.</b>
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**Advance Ruling No. 13/ARA/2026, dated 27.02.2026**

*1. Any appeal against this Advance Ruling order shall lie before the Tamil Nadu State Appellate Authority for Advance Ruling, Chennai as under Sub-Section (1) of Section 100 of CGST Act / TNGST Act 2017, within 30 days from the date on the ruling sought to be appealed is communicated.*

*2. In terms of Section 103(1) of the Act, Advance Ruling pronounced by the Authority under Chapter XVII of the Act shall be binding only-*

*(a) on the applicant who had sought it in respect of any matter referred to in sub-section (2) of Section 97 for advance ruling.*

*(b) on the concerned officer or the jurisdictional officer in respect of the applicant.*

*3. In terms of Section 103(2) of the Act, this advance ruling shall be binding unless the law, facts or circumstances supporting the original advance ruling have changed.*

*4. Advance Ruling obtained by the applicant by fraud or suppression of material facts or misrepresentation of facts, shall render such ruling to be void ab initio in accordance with Section 104 of the Act.*

*5. The provisions of both the Central Goods and Services Tax Act and the Tamil Nadu Goods and Services Tax Act (herein referred to as the Act) are the same except for certain provisions. Therefore, unless a mention is specifically made to such dissimilar provisions, a reference to the Central Goods and Services Tax Act would also mean a reference to the same provisions under the Tamil Nadu Goods and Services Tax Act.*

GSTIN Number, if any / User id	<b>33AAHPU1292P1Z4</b>
Legal Name of Applicant	<b>SIVASUBRAMANIAM UMAPATHY</b>
Trae Name of Applicant	<b>M/s. UMAPATHY POULTRY FARMS</b>
Registered Address/Address provided while obtaining user id	No.4/22, Nasuvampalayam, Venkittapuram P.O. Palladam, Tiruppur, Tamil Nadu – 641 664.
Details of Application	GST ARA – 01 Application dated 10.02.2025
Jurisdictional Officer  Concerned Officer	<b>State:</b> Palladam-1 Assessment Circle Thiruppur-III Zone Thiruppur Division  <b>Center:</b> Coimbatore Commissionerate Division: Coimbatore -IV Palladam Range
Nature of activity(s) (proposed / present) in respect of which advance ruling sought for	
A Category B Description (in brief)	Wholesale/Retail Business  The applicant is involved in poultry farming, where eggs are produced, packed into boxes, and sold without undergoing any process. The packaging is customized according to customer requirements and quality specifications. No processing is performed on the eggs. Poultry farming operations are carried out on both owned and leased farms.
Issue/s on which advance ruling required	1. Applicability of a notification issued under the provisions of this Act 2. Determination of the liability to pay tax on any goods or services or both
Question(s) on which advance ruling is required	Q1.Is the transportation of eggs through GTA services exempt, and do the RCM provisions apply in this case? Q2.Is the transport of eggs via railway services exempt? Q3.Is the lease of agricultural land for grazing hens exempt, and do the RCM provisions apply? Q4.Is the use of land along with a poultry shed for sheltering birds exempt, and are RCM provisions applicable?

**M/s. UMAPATHY POULTRY FARMS** No.4/22, Nasuvampalayam, Venkittapuram P.O. Palladam, Tiruppur, Tamil Nadu – 641 664 (hereinafter ‘the Applicant’) are registered under the GST Act with GSTIN: **33AAHPU1292P1Z4**. The applicant is involved in poultry farming, where eggs are produced, packed into boxes, and sold without undergoing any process. The packaging is customized according to customer requirements and quality specifications. No processing is performed on the eggs. Poultry farming operations are carried out on both owned and leased farms. In this regard, the applicant has sought advance ruling on the following questions:

- Q1. Is the transportation of eggs through GTA services exempt, and do the RCM provisions apply in this case?
- Q2. Is the transport of eggs via railway services exempt?
- Q3. Is the lease of agricultural land for grazing hens exempt, and do the RCM provisions apply?
- Q4. Is the use of land along with a poultry shed for sheltering birds exempt, and are RCM provisions applicable?

2. The Applicant has made a payment of application fees of Rs.5,000/- each under sub rule (1) of Rule 104 of CGST Rules, 2017 and SGST Rules, 2017.

### **3.Statement of relevant facts:**

3.1 The applicant operates a poultry farming business focused on egg production. The eggs are packed into boxes and sold without any processing. The packaging is made to meet customer requirements and quality standards. The poultry farming activities are conducted on a mix of owned and leased farms.

### **4.Interpretation of Law by the Applicant based on the statement of facts:**

4.1 The applicant submits relevant extract of exemption Notification No.12/2017-CT (R) of CGST Act, 2017, as follows:

*“agricultural produce” means any produce out of cultivation of plants and rearing of all life forms of animals, except the rearing of horses, for food, fibre, fuel, raw material or other similar products, on which either no further processing is done or such processing is done as is usually done by a cultivator or producer which does not alter its essential characteristics but makes it marketable for primary market”*

4.2 The applicant is of the view that, since the eggs are obtained through animal rearing and on which no additional processing is done by the applicant, they can be appropriately classified as “agricultural produce”.

5.1 The applicant falls within the administrative jurisdiction of ‘STATE’. Remarks has been received from the State jurisdictional authorities and informed that there are no pending proceedings against the applicant on the questions raised by them in their advance ruling application.

5.2 No remarks have been received from Central jurisdictional authorities. Hence, it is construed that there are no pending proceedings against the applicant on the questions raised by them in their advance ruling application.

## **6. PERSONAL HEARING**

6.1 The applicant was given an opportunity to be heard in person on 01.09.2025 vide this office memorandum No.10/ARA, dated 22.08.2025. The applicant through email dated 29.08.2025 have replied that they are unable to attend the hearing on the specified date, since their authorized representative was unavailable on the said date and requested adjournment for 15 days.

6.2 Accordingly, the applicant was given another opportunity of personal hearing on 23.09.2025 vide this office memorandum No.10/2025, dated 10.09.2025. Mr.R.Jothilingam, Accounts Manager of M/s. Umapathy Poultry Farms, Mr.S.Harishankar, Chartered Accountant and Mr.S.Pradeep, Chartered Accountant appeared as Authorized Representatives of the applicant. The AR reiterated the submissions made in their application for advance ruling.

6.3 The AR informed that they are cleaning and packing the eggs and transporting them to dealers situated all over India. They informed that they use cardboard packing box for packing the eggs; that they use various packages having labelling and branding of the customers for packing the eggs as per the requirements of their customers. The AR also informed to the Members that the Goods Transporters and the Railway authorities had told them that they need to pay the GST on the transportation of eggs on the Reverse Charge Mechanism basis, so they have filed the present application for clarification on the issue. Further, the AR informed that they have poultry shed on land owned by them and also on land taken on lease basis for the purpose of erecting poultry shed.

6.4 The Members asked the AR to provide copies of the Lease Contract/Agreement copies entered with land owners for which the AR agreed to provide the same at the earliest. In the end, they stated that they have nothing more to add.

## **7. DISCUSSION AND FINDINGS:**

7.1 We have carefully examined the submissions made by the applicant in their advance ruling application and the additional documents submission made after the personal hearing. The applicant has sought advance ruling on the following questions:

- Q1. Is the transportation of eggs through GTA services exempt, and do the RCM provisions apply in this case?
- Q2. Is the transport of eggs via railway services exempt?
- Q3. Is the lease of agricultural land for grazing hens exempt, and do the RCM provisions apply?
- Q4. Is the use of land along with a poultry shed for sheltering birds exempt, and are RCM provisions applicable?

7.2 In this regard, the provisions of Section 95 of the CGST Act, 2017 are reproduced below for reference:-

*(a) "advance ruling" means a decision provided by the Authority or the Appellate Authority or the National Appellate Authority to an applicant on matters or on questions specified in sub-section (2) of section 97 or sub-section (1) of Section 100 or of section 101C, in relation to the supply of goods or services or both being undertaken or proposed to be undertaken by the applicant;*

7.3 From the applicant's submission, it is understood that the applicant is recipient of the services namely transportation of goods by Road, transportation of goods by Rail, leasing of agricultural land with or without shed or for grazing and sheltering hens. As per Section 95 (a) of the CGST Act, 2017, decision can be provided by the Authority on questions relating to the services being undertaken or proposed to be undertaken by the applicant. In the instant case, the applicant is a recipient of services mentioned in his questions. Therefore, this Authority is not in a legal position to provide decision on the questions raised by the applicant.

7.4 Further, vide Sl.No.13 of the application for advance ruling filed by the applicant, the applicant has indicated that the said query falls under the scope of

'Determination of the liability to pay tax on any goods or services or both' and 'Applicability of notification issued under the provisions of this Act'. However, from the submissions made, it is seen that the applicant is recipient of the services mentioned by them in the questions. Therefore, the determination of the liability to pay tax vests with the suppliers of such services and not with the applicant. Accordingly, as the assessment to tax does not relate to the applicant and since they are only a recipient of service, the application is not liable for admission.

7.5 In view of the above, a notice dated 30.10.2025, had been issued to the applicant with a request to offer his reply/comments, as to why their application should not be rejected on the aforesaid grounds.

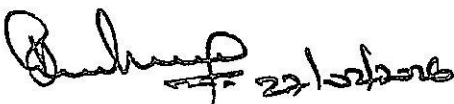
7.6 In reply to the notice, the applicant in their letter dated 26.11.2025 have stated that upon further review by them, it was noted that the determination of the liability to pay tax vests with the supplier of the goods/services. As the responsibility for assessing and discharging the applicable tax rests with the suppliers, the matter does not fall within the scope of an Advance Ruling application filed them as the recipient. Hence, requested the Hon'ble Advance Ruling Authority to permit them to withdraw the Advance ruling application filed by them.

7.7 After due consideration, the aforementioned letter of the applicant, wherein they have requested to permit withdrawal of the Advance ruling application filed by them and as they do not wish to pursue it any further, is taken on record. Hence, their request is considered and the application is allowed to be treated as withdrawn without going into the merits or detailed facts of the case.


8.0 In view of the above, we rule as under:

#### RULING

The ARA Application received from the applicant on 10.02.2025 is disposed as withdrawn as per the request of the applicant.

  
(B. Suseel Kumar)  
Member (SGST)



  
(C. Thiyagarajan)  
Member (CGST)

To

**M/s. Umapathy Poultry Farms,**  
No.4/22, Nasuvampalayam,  
Venkittapuram (P.O),  
Palladam, Tiruppur – 641 664 (By Speed Post)

**Copy submitted to :**

1. The Principal Chief Commissioner of GST and Central Excise,  
26/1, Uthamar Mahatma Gandhi Road, Nungambakkam, Chennai-34.
2. The Commissioner of Commercial Taxes,  
2<sup>nd</sup> Floor, Ezhilagam, Chepauk, Chennai 600 005.
3. The Commissioner of GST and Central Excise,  
Coimbatore Commissionerate,  
No. 6/7, A.T.D. Street, Race Course,  
Coimbatore – 641 018.

**Copy to :**

1. The Assistant Commissioner (ST),  
Palladam -1 Assessment Circle,  
No.10, Pollachi Road,  
Palladam – 641 664.
2. Master File / Stock File – A1